

AO91 (Rev. 5/85) Criminal Complaint

DEC 26 2012

UNITED STATES DISTRICT COURT

JULIA C. DUDLEY, CLERK
BY: *[Signature]*
DEPUTY CLERK
Virginia

Western

DISTRICT OF

UNITED STATES OF AMERICA
V.

CRIMINAL COMPLAINT

Case Number:

7:12MS 403

Paul Traxel
75 Fairfax Village
Harrisburg, Pennsylvania 17112

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my
 Knowledge and belief. On or about 07/18/2012 & 07/26/2012 in Roanoke County
Western District of Virginia Defendant(s) did, (Track Statutory Language of Offense)

Possession of a firearm in furtherance of a drug trafficking crime

And,

Manufacture, Distribute, Dispense a controlled substance

in violation of Title 18 & 21 United States Code, Section(s) 924(c), 841 (a)(1)

I further state that I am a(n) Special Agent, Bureau of ATF And that this complaint is based on the
 following facts:
 Official Title

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof:

☒ Yes ☐ No*[Signature]*
Signature of Complainant

Sworn to before me and subscribed in my presence,

12-21-12

Date

at Roanoke, Virginia

City and State

Honorable Robert Ballou, US Magistrate Judge

Name and Title of Judicial Officer

[Signature]
Signature of Judicial Officer

AFFIDAVIT OF:

Special Agent Michael C. Cilento

Bureau of Alcohol, Tobacco, Firearms and Explosives

I, Michael C. Cilento, being duly sworn, state that I am a Special Agent with the U.S. Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), and have been employed since July 01, 2001. I am currently assigned to the Roanoke, Virginia ATF Field Office. I have successfully completed the Criminal Investigators Training Program and New Professional Training, ATF National Academy, held at the Federal Law Enforcement Training Center, Glynco, Georgia. I have also successfully completed the Firearms Interstate Nexus Expert course, held at the ATF National Tracing Center, Martinsburg, West Virginia. Prior to this employment, I was employed as a sworn police officer for the City of Chesapeake, Virginia for six years. During those six years, I was assigned to the Uniform Patrol Division and the Traffic Bureau. I was responsible for investigating Felony crimes of violence, property crimes, and assisted in drug trafficking investigations. Since becoming an ATF Special Agent, I have provided sworn testimony before the Federal Grand Jury and in the U.S. District Court in reference to violations of the Federal Firearms laws and Narcotics laws. As a result of my training and experience as an ATF Special Agent, I am familiar with Federal criminal laws and know that it is a violation of :

Title 18, USC 841(a)(1), unlawful to manufacture, distribute, dispense or possess with the intent to manufacture, distribute, dispense or possess a controlled substance.

Title 18, USC 924(c), unlawful to use, carry, or possess a firearm in relation or in furtherance of a drug trafficking crime.

The following information is provided in support of an Application and Affidavit for an Arrest Warrant for the person of Paul TRAXEL, date of birth 01-15-1979. The ATF Roanoke Filed Office has conducted this investigation. Your affiant participated in this investigation and is familiar with the information contained in this affidavit. I obtained the following information from ATF Special Agent Keith Teehan and ATF TFO Craig Frye. I have not included all the facts relative to this investigation, but have only included those facts necessary to establish relevant probable cause.

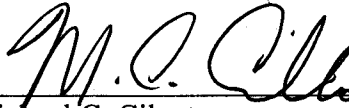
1. On 07/18/2012, as part of a series of controlled purchases, ATF Roanoke S/A Keith Teehan supervised an ATF Confidential Informant during the controlled purchase of two (2) gallons of GHB and a firearm from Paul TRAXEL (W/M, DOB: 07/17/1979, FBI#:393209NB9). This transaction occurred at a predetermined location in Roanoke, Virginia. CI # 272 had previously arranged via text messaging on his mobile phone to meet TRAXEL and purchase two (2) gallons of GHB and a firearm for \$3400.00. The text message between the CI and TRAXEL were sent/ received from TRAXEL at phone number (757) 779-6476. Under the direction and supervision of ATF Roanoke CI # 272 met with and purchased the above mentioned two gallons of GHB and a Heckler and Koch semiautomatic pistol. The transaction was visually monitored by ATF Roanoke and electronically recorded. TRAXEL was positively identified by Special Agent Keith Teehan. The GHB was submitted to the Drug Enforcement Administration Laboratory for analysis and found to be 1,4 butanediol. 1,4 butanediol is listed as the same schedule as GHB. The firearm was examined and found to have affected or traveled in interstate commerce and capable of firing a projectile by the action of an explosion.
2. On 07/26/2012, as part of a series of controlled purchases, ATF Roanoke S/A Keith Teehan supervised an ATF Confidential Informant during the controlled purchase of two (2) gallons of GHB and a firearm from Paul TRAXEL. This transaction occurred at a predetermined location in Roanoke, Virginia. CI # 272 had previously arranged via text messaging on his mobile phone to meet TRAXEL and purchase two (2) gallons of GHB and a firearm for \$3500.00. The text message between the CI and TRAXEL were sent/ received from TRAXEL at phone number (757) 779-6476. Under the direction and supervision of ATF Roanoke CI # 272 met with and purchased the above mentioned two gallons of GHB and a DC Industries, AK-47 type, semiautomatic rifle. The transaction was visually monitored by ATF Roanoke and electronically recorded. TRAXEL was positively identified by Special Agent Keith Teehan. The GHB was submitted to the Drug Enforcement Administration Laboratory for analysis. The firearm was examined and found to have affected or traveled in interstate commerce and capable of firing a projectile by the action of an explosion.

Based on my knowledge, training and experience the information set forth in this Affidavit constitutes supportive evidence:

That Paul TRAXEL, on 07/18/2012 and 07/26/2012, distributed approximately two gallons of GHB in violation of Title 21 USC 841 (a)(1).

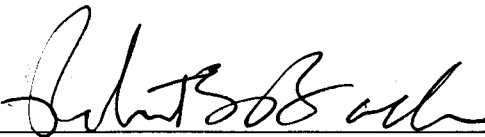
That Paul Traxel, on 07/18/2012 and 07/26/2012, used, carried, or possessed a firearm during, in relation to, or in furtherance of a drug trafficking crime, in violation of 18 USC 924 (c).

The aforementioned violations took place in and around Roanoke County, in the Western District of Virginia.



Michael C. Cilento
Special Agent
Bureau of Alcohol, Tobacco, Firearms and Explosive

Subscribed and sworn before me, this, the 21st day of December, 2012.



The Honorable Robert Ballou
United States Magistrate Judge